

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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DEBORAH YOUNG, Individually and as the parent  
and natural guardian of MELISSA YOUNG,  
EMMALEE YOUNG, and CECELIA YOUNG,

Plaintiffs,

Index No. 09-cv-3325 (JFB) (ARL)

- against -

SUFFOLK COUNTY; SUFFOLK COUNTY  
DEPARTMENT OF SOCIAL SERVICES;  
SUFFOLK COUNTY POLICE DEPARTMENT;  
MICHAEL DELGADO; JOSEPH QUATELA;  
EDMUND J. COPPA, Individually and  
EDMUND J. COPPA PHOTOGRAPHY;  
RAYMOND L. YOUNG; RAYMOND M.  
YOUNG; NEWS 12; NEWSDAY; NEW YORK  
POST; NEW YORK DAILY NEWS; and  
WCBSTV.COM,

Defendants.

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**NOTICE OF MOTION  
TO DISMISS THE  
AMENDED COMPLAINT**

ORAL ARGUMENT REQUESTED

PLEASE TAKE NOTICE that upon the accompanying memorandum of law and upon all prior pleadings and proceedings heretofore had herein, defendants Edmund J. Coppa,<sup>1</sup> News 12, Newsday, New York Post, New York Daily News, and CBS Broadcasting Inc., incorrectly sued here as WCBSTV.COM (together, the “Media Defendants”) will move this Court before the Hon. Joseph F. Bianco, United States District Judge, in Courtroom 920, United States District Court for the Eastern District of New York, Long Island Courthouse, 100 Federal Plaza, Central Islip, New York, on January 29, 2010 at 11:00 a.m., or as soon thereafter as counsel can be heard, for an order dismissing the Amended Complaint in its entirety as against them, with prejudice, pursuant to Fed. R. Civ. P. 12(b)(6), and for such other and further relief as the Court

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<sup>1</sup> The Amended Complaint also names Edmund J. Coppa Photography as a defendant, but there is no such entity.

deems just and appropriate.

Pursuant to the Order of the Court dated November 6, 2009, plaintiff's papers in opposition to this motion, if any, are due on or before January 6, 2010, and Media Defendants' reply papers, if any, are due on or before January 19, 2010.

Dated: December 4, 2009

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**CERTIFICATE OF SERVICE**

I hereby certify that on December 4, 2009, copies of the foregoing were served via the Court's ECF system upon the following:

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